

**Avery Landing Biological Assessment  
Responses to USFWS**

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***1) USFWS Question:***

Page 2-1 indicates that there are, “drums of investigation derived waste” onsite from an earlier EPA cleanup. Will these drums and the 5,000 gallon storage tank be removed as part of this project?

***EPA Response:***

The drums of investigation derived waste remaining on-Site from the EPA 2007 site investigation and the aboveground storage tank will be removed as part of the cleanup action.

***2) USFWS Question:***

Page 2-4 states that “The treated groundwater will be discharged to the St. Joe River and/or allowed to passively infiltrate the soil.” What water quality standards will the treated water be held to? It is the Service's position that any contaminates that are added to the watershed represents a potential negative effect that may adversely affect migratory birds, bull trout and/or their forage base. Thus, we strongly recommend that if water does not meet an approved Idaho DEQ and EPA sampling and analysis plan and/or exceeds background river levels of contaminates it should be transported to a certified wastewater treatment plant and not discharged into the St. Joe River or allowed to infiltrate the soil.

***EPA Response:***

Groundwater will be treated with the use of an oil/water separator after which water will be filtered through carbon polishing to remove residual dissolved organic contaminants. The treated groundwater would then be discharged to the St. Joe River and/or allowed to passively infiltrate back into the soil. If, after filtration, results from water quality testing identifies contaminants still present above site cleanup levels and/or background surface water levels, additional treatment measures will be applied, which may include additional on-Site filtration or disposal at a certified wastewater treatment plant off-Site.

***3) USFWS Question:***

Page 2-5 states that contaminated riprap will be removed to an on-site geomembrane lined treatment area to be steam cleaned and/or pressure washed. We are again concerned about the water that will be produced as a result of washing the contaminated riprap (see above comment). Since the washing will take place on a lined treatment area, will the water simply be allowed to evaporate off the liner? Please describe what will happen with the waste water after the cleaning of the riprap occurs.

***EPA Response:***

Wash water from the contaminated riprap will be collected and then treated with the on-Site water treatment system used for treating groundwater (as described in response to Question #2).

***4) USFWS***

Page 2-5 states that a temporary dam-like structure may be constructed on the stream-side of the existing bulkhead to exclude water from the excavation. Please describe what this structure will be made of, how it will be constructed, and its dimensions.

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### ***EPA Response:***

To facilitate bank reconstruction activities, a temporary dam-like structure may be constructed on the stream-side of the existing bulkhead to exclude water from the excavation. The specific details of such a structure, if determined to be necessary, will be developed during the project design phase. If constructed, it is anticipated that the temporary dam-like structure will be constructed of large boulders or precast concrete structures and would only extend as far into the river as necessary to divert surface water during bank reconstruction. At the conclusion of removal, any backfilled and disturbed areas will be graded and stabilized to prevent erosion and sedimentation of the St. Joe River.

### ***5) USFWS***

Page 2-6 discusses construction schedules. USFWS in-water work windows for this section of the St. Joe River typically run from July 15-September 1st and Nov. 1-February 28. This would include the portions of the project that include removal/replacement of the riprap and construction of the dam-like structure. Typically, if the project cannot be finished within one work window or multiple work windows are requested, we ask for an assurance that the conservation measures (Best Management Practices) that are left in place will be sufficiently maintained in a manner that will prevent additional erosion into the St. Joe River.

### ***EPA Response:***

A project schedule and time frame for conduct of the removal action has not yet been prepared; however, it is anticipated that the project will begin sometime during June 2012 and it is expected to require approximately 3½ months to complete. One of the first tasks to be performed as part of the action will be the in-stream work to isolate the Site from the St. Joe River, and this work will likely occur mid- to late June 2012.

### ***6) USFWS***

Page 2-7- Please describe what “non-eroding granular material” is.

### ***EPA Response:***

Use of “granular” is a mistake; the correct description is “non-eroding gravel material.”